

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

SDMS Document



67712

DATE: MAY 17 1985

SUBJECT: SCP-Carlstadt Site
Draft Feasibility Study

FROM: John S. Malleck, Acting Chief
Office of Ground Water Management

TO: Raymond Basso, Chief
New Jersey Compliance Branch

As requested and in accordance with the Memorandum of Inter-divisional Coordination between the Emergency and Remedial Response Division and Water Management Division (WMD), WMD has reviewed the Draft Feasibility Study for the SCP-Carlstadt Site from the water programs perspective. We offer the following comments:

- o The lack of reference maps makes it difficult to follow the recommended alternative, First Operable Unit C (FOU C). Figure 2-1, Cross Section of Strata, does not refer to any maps contained in the document. It was necessary to reconstruct the cross section from this figure onto Figure 1-4 which shows the monitoring wells referred to in the cross section of strata (Fig. 2-1). This information must then be related to SCP Site Map (Fig. 1-3) to understand ground water flow characteristics through the site.
- o The detailed description of FOU site alternative C omits information which is necessary for evaluation of the methodologies chosen. As there is more detail available on the location of the slurry wall installation and on the final grade of the cap, we would appreciate the opportunity to review this additional information.
- o With the location of this site in an estuarine environment we feel that the possibility of rising water levels could present a problem with the feasibility of the slurry wall. The possibility of flood conditions should be evaluated, and a worst-case scenario be presented to test for the integrity of the slurry wall and cap. In addition, compatibility of the slurry wall with the estuarine waters should be evaluated. We suggest monitoring the condition of the slurry wall to determine degradation.
- o This alternative will require either a permit for the discharge of treated ground water to the POTW or compliance with NJPDES toxic effluent limits for discharge to Peach Island Creek.
- o The ground water at this site may be established as Class I ground water based on the following criteria from

Guidelines for Ground-Water Classification : 1) the classification review area (CRA) be ecologically vital and 2) the (CRA) be in a highly vulnerable hydrogeologic setting. The Marine and Wetlands Protection Branch is reviewing the site in consideration of wetlands fed by ground water may support an endangered species population. We will forward the results of their review as soon as possible.

If you have any comments please call me or Donna Hasbrouck of my staff at x-5635.

cc: J.Frisco
 ✓ J.Feldstein

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